

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Station)
(Gaylord, Michigan))

MB Docket No. _____
RM- _____

Accepted / Filed

To: Marlene Dortch, Secretary
Federal Communications Commission
Attn: Audio Division, Media Bureau

AUG 17 2016

Federal Communications Commission
Office of the Secretary

PETITION FOR RULE MAKING

Comes Now, N Content Marketing, LLC ("Petitioner"), by Counsel and pursuant to Sections 1.401 and 1.420 of the Commission's Rules, and hereby requests that the Commission institute a rulemaking proceeding to amend Section 73.202(b) of the Commission's Rules, the Table of Allotments. Specifically, Petitioner requests that the Table of FM Allotments be amended so as to allocate Channel 246C2 to Gaylord, Michigan.

The allocation to Gaylord can be accomplished in complete accordance with the Commission's Rules governing allocations. Specifically, as demonstrated in the attached Engineering Exhibit¹ prepared by Bromo Communications, Inc., the proposed allocation meets all spacing requirements².

¹ See Exhibit 1, Engineering Exhibit.

² The proposed reference coordinates are: 44-59-16 NL x 84-21-55 WL.

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MB-Audio 16-4

The following table summarizes the change requested in the Petition:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Gaylord, MI	201C, 213C, 268C, 294C	201C, 213C, 268C, 294C, 246C2

The Petitioner believes the public interest will be served by adopting the proposed amendment as it would provide a fifth (5th) service to the Gaylord, Michigan area. This new service will promote the Commission's goal of enhancing diversity of thought and opinion in the broadcast media as well as the charge of Congress to the Commission to ensure a fair, efficient, and equitable distribution of radio services in the United States.³ Concurrent with the submission of this Petition an application (FCC Form 301) is being filed by Petitioner as required by Commission procedures⁴.

If the allocation is adopted by the Commission, Petitioner commits to participate in any FM auction for said allocation. In addition, if awarded thru the auction process, Petitioner commits to construct this new facility.

Conclusion

Accordingly, Petitioner respectfully urges the Commission to issue a Notice of Proposed Rulemaking for the proposed changes herein.

³ 47 U.S.C. Section 307(b).

⁴ See Revisions of Procedure Governing Amendments to FM Table of Allotments and Change of Community of License in the Radio Service, 21 FCC Rcd 14212, para. 17 (2006)

Respectfully submitted,

N Content Marketing, LLC

By: 

John C. Trent, Esquire
It's Counsel

August 17, 2016

Putbrese Hunsaker & Trent, P.C.
200 S. Church Street
Woodstock VA 22664

Exhibit 1

Engineering Exhibit

**Technical Portion
Petition for Rule Making
Gaylord, Michigan
August 2016**

This Technical Portion of the Petition for Rule Making is being compiled on behalf of N Content Marketing, LLC. N Content wishes to have Channel 246 C2 assigned at Gaylord, MI as its 5th FM station.

The Allocation can be made with no other changes being required to the Table of Allotments:

**Gaylord Allocation Coordinates
Channel 246 C2
(NAD 27)**

**44 59 16 North Latitude
84 21 55 West Longitude**

Attached is a map showing uniform terrain coverage from the Class C2 allocation site. The proposed Class C2 allocation serves all of Gaylord, MI with the 70 dBu class maximum signal without terrain blockage.

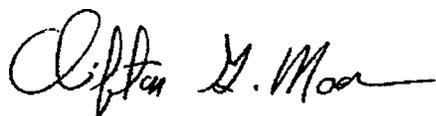
Gaylord, MI is located in Otsego County. Otsego County is not part of any rated metro market.

Proposal

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Gaylord, MI	201C, 213C, 268C2 294C1	201C, 213C 268C2, 294C1, 246C2

This proposal will serve 31, 339 Persons and an area of 3,338.78 SQ KM within the uniform terrain 70 dBu and 74,736 persons and an area of 8,411.76 SQ KM within the normally calculated 60 dBu.

All information contained herein is sworn to be accurate to the knowledge of the undersigned:



August 2, 2016

Clifton G. Moor, Bromo Communications, Inc.
Technical Consultant to N Content Marketing, LLC

N Content Marketing, LLC
Channel 246 C2 - Gaylord, MI
Searching at Allocation Coordinates

REFERENCE

44 59 16.0 N.
 84 21 55.0 W.

CLASS = C2 Int = B
 Current Spacings to 3rd Adj.
 ----- Channel 246 - 97.1 MHz -----

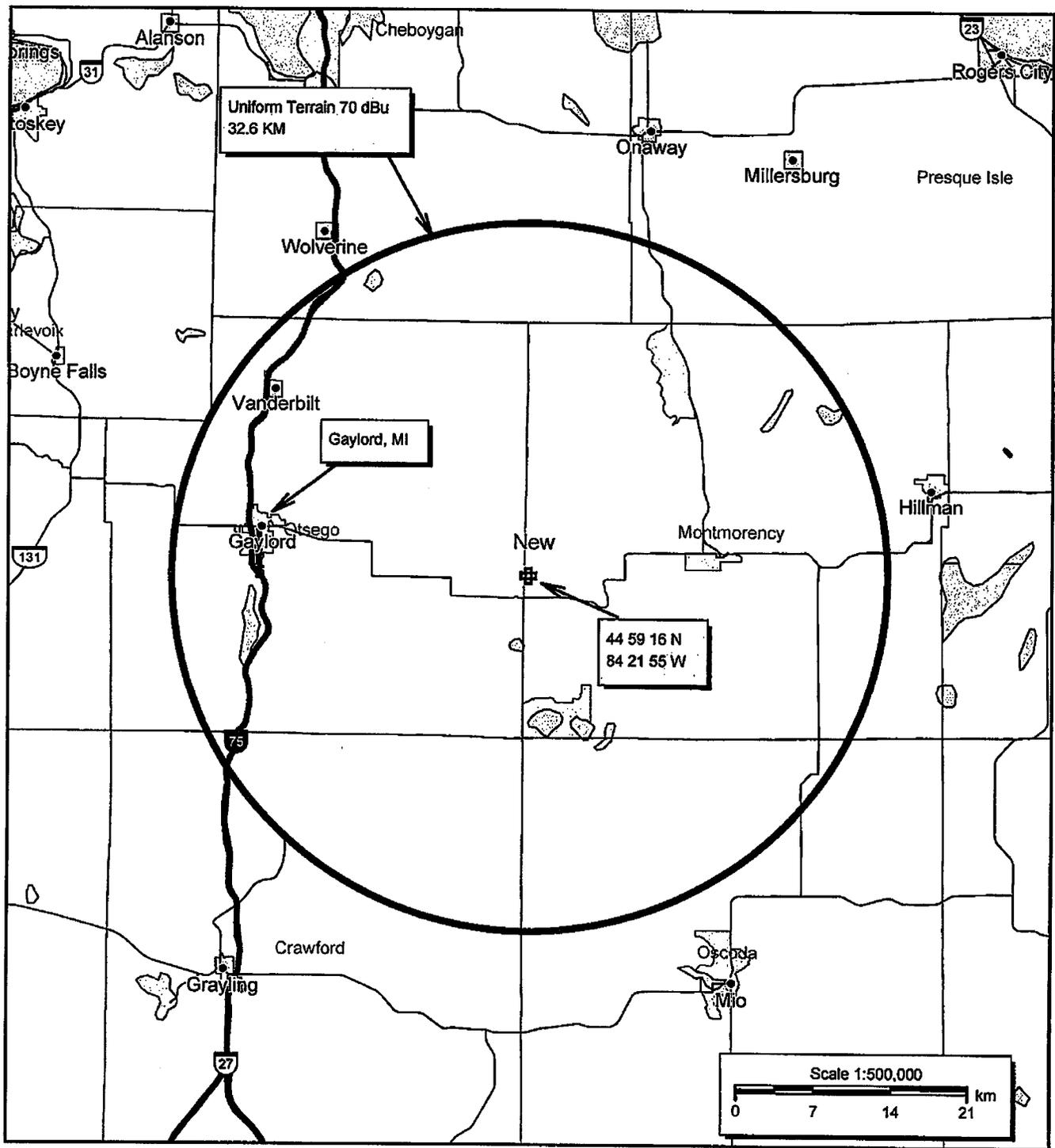
DISPLAY DATES

DATA 08-02-16
 SEARCH 08-02-16

Call	Channel	Location		Azi	Dist	FCC	Margin	
WGLQ	LIC	246C0	Escanaba	MI	303.3	238.53	238.5	0.03
WRGZ	LIC	244C2	Rogers City	MI	48.3	60.99	57.5	3.5
WWCM	LIC	245A	Standish	MI	164.9	109.54	105.5	4.0
AL5350	AL	247B	Sault Ste Marie	ON	0.8	169.91	163.5	6.4
WKLT	LIC	248C2	Kalkaska	MI	252.7	72.38	57.5	14.9
WCHY	LIC-N	249C3	Cheboygan	MI	1.3	73.64	55.5	18.1
WHSB	LIC	299C1	Alpena	MI	80.5	51.88	26.5	25.4

 Reference station has protected zone issue: Canada
 All separation margins include rounding

Bromo Communications, Inc.



Petition for Rule Making
N Content Marketing, LLC
 246 C2 - 97.1 mhz
 Gaylord, MI

Bromo Communications, Inc.

August 2016